

EXHIBIT C
TO ENGSTROM DECL.

Sooy, Nora B.

From: Engstrom, Shruti D.
Sent: Wednesday, July 24, 2019 10:10 AM
To: Alison Christian; Ellison, John N.
Cc: Matt.H.Oglesby@p66.com; Lon Johnson
Subject: RE: Major v. SFPP, L.P., et al.
Attachments: Norton Rose Invoice 07.08.19_Redacted.pdf

Good morning Alison,

Defense counsel was able to get an extension of the offer to Tuesday, July 30. We would appreciate a response to our demand letter before the end of this week. On a related matter, and as a follow up to Matt Oglesby's email of July 8 regarding outstanding fees and expenses from April 2019 to present, I'm attaching a redacted copy of Norton Rose's July 8, 2019 invoice. Can you advise on the status of repayment of the outstanding fees and expenses?

Regards,
Shruti

Shruti D. Engstrom
+1 215 851 8167
sengstrom@reedsmith.com

Reed Smith LLP
Three Logan Square
Suite 3100
1717 Arch Street
Philadelphia, PA 19103
+1 215 851 8100
Fax +1 215 851 1420

From: Alison Christian
Sent: Tuesday, July 23, 2019 6:26 PM
To: Ellison, John N.
Cc: Engstrom, Shruti D. ; Matt.H.Oglesby@p66.com; Lon Johnson
Subject: RE: Major v. SFPP, L.P., et al.

EXTERNAL E-MAIL

Hi John,

Thanks for reaching out – I look forward to working with you on this case.

We were told that the \$300,000 settlement offer expired last Tuesday at 5:00. Has another offer been extended?

Alison R. Christian

Christian,
Dichter &
Sluga, P.C.

2700 N. Central Ave. Suite 1200
Phoenix, Arizona 85004
Office: (602) 792-1700
Direct: (602) 792-1706
Fax: (602) 792-1710
AChristian@cdslawfirm.com
www.cdslawfirm.com

In Nevada and Arizona:

Christian, Kravitz, Dichter, Johnson & Sluga, LLC
8985 Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Office: 702 362-6666
Fax: 702 992-1000
www.ckllclaw.com



From: Kelly, Kimberly A. <KKelly@reedsmith.com>
Sent: Tuesday, July 23, 2019 12:23 PM
To: Alison Christian <achristian@cdslawfirm.com>
Cc: Engstrom, Shruti D. <SEngstrom@ReedSmith.com>; Ellison, John N. <JEllison@ReedSmith.com>;
Matt.H.Oglesby@p66.com
Subject: Major v. SFPP, L.P., et al.

Attached please find correspondence sent on behalf of John Ellison.

Kimberly A. Kelly
215-851-8119
kkelly@reedsmith.com

Reed Smith LLP
Three Logan Square
Suite 3100
1717 Arch Street
Philadelphia, PA 19103
+1 215 851 8100
Fax +1 215 851 1420

* * *

This E-mail, along with any attachments, is considered confidential and may well be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.

Disclaimer Version RS.US.201.407.01

Norton Rose Fulbright-Houston - 9495129093 for P-2018-0144**Invoice Header****Organization Name**

Norton Rose Fulbright-Houston - 5619

Matter Name

Major, Mary vs. SFPP, L.P. - P-2018-0144

Matter No

P-2018-0144

Organization Address

1301 MCKINNEY ST. HOUSTON, TX 77010 (LEDES)

Invoice Date

07/08/2019

Invoice Start Date

06/01/2019

Invoice End Date

06/30/2019

Description

Major, Mary

Totals Summary**Fees**

39,592.00 USD

Fee Discount

0.00 USD

Fee Adjustment

0.00 USD

Taxes

0.00 USD

Expenses

1,379.07 USD

Expense Discount

0.00 USD

Expense Adjustment

0.00 USD

Net Total

40,971.07 USD

Details

Date	Type	Desc	Task/ Expense	Act	TK ID	Hours/ Units	Rate	Disc	Adj	Tax	Net Amount
06/24/2019	Fee	Reviewing file for information pertaining to Al Cantu and composing outline of topics to cover	L130		143538	7.20	375.00 USD	0.00 USD			2,700.00 USD

Date	Type	Desc	Task/ Expense	Act	TK ID	Hours/ Units	Rate	Disc	Adj	Tax	Net Amount
		in preparation for upcoming conference call, attending conference call with Al Cantu, composing report regarding conference call with Al Cantu, preparing for conference call with Jim Stanley on OSHA issues, attending conference call with Jim Stanley, composing report regarding conference call with Jim Stanley, exchanging emails with client group regarding upcoming conference calls, researching Arizona case law on asbestos issues for additional research on various expert issues, composing summaries of conference calls with Al Cantu and Jim Stanley.									
06/25/2019	Fee	Beginning research on Ninth Circuit case law on various expert issues, preparing for conference call with Mark Nealley and Tom Thompson regarding IH issues, attending conference call with Mark Nealley and Tom Thompson regarding IH Issues, preparing for conference call with Abe Castro regarding IH issues, attending conference call with Abe Castro regarding IH Issues, composing summary of conference calls.	L120		143538	7.40	375.00 USD	0.00 USD			2,775.00 USD
06/26/2019	Fee	Continuing research of Ninth Circuit case law regarding various expert issues, composing proposed list of document requests to Bureau Veritas for IH testing records, exchanging emails with Matt Oglesby regarding document requests to Bureau Veritas for IH testing records	L120		143538	8.80	375.00 USD	0.00 USD			3,300.00 USD
06/28/2019	Fee	Composing report summarizing research of Arizona state courts, Ninth Circuit federal courts, and select non-jurisdictional cases pertaining to various expert issues.	L120		143538	8.50	375.00 USD	0.00 USD			3,187.50 USD
06/27/2019	Fee	Completing research in non-jurisdictional federal cases on	L120		143538	8.30	375.00 USD	0.00 USD			3,112.50 USD

Date	Type	Desc	Task/ Expense	Act	TK ID	Hours/ Units	Rate	Disc	Adj	Tax	Net Amount
		various expert issues. Conferring via telephone with Bureau Veritas regarding upcoming subpoena for records from NATLSCO and The Clayton Group on IH testing records. Beginning compilation and review of noted medical records to be sent to experts.									
06/30/2019	Fee	Continue review and compilation of key medical records to be sure all proper records are sent to experts.	L130		143538	2.20	375.00 USD	0.00 USD			825.00 USD
06/28/2019	Fee	Correspondence with court reporter regarding confirmation of errata sheets sent.	L110		141349	0.20	150.00 USD	0.00 USD			30.00 USD
06/28/2019	Fee	Review medical summary, identify and gather medical records referenced on summary and process all documents to Attorney Rutledge for review.	L140		141349	1.60	150.00 USD	0.00 USD			240.00 USD
06/26/2019	Fee	Review and process deposition transcripts and exhibits of Therese Tuazon and Robert Granado.	L140		141349	0.60	150.00 USD	0.00 USD			90.00 USD
06/27/2019	Fee	Review medical summary, identify and gather medical records referenced on summary.	L140		141349	3.90	150.00 USD	0.00 USD			585.00 USD
06/27/2019	Fee	Telephone conference with Co-Counsel s paralegal regarding medical records and medical records summary.	L110		141349	0.20	150.00 USD	0.00 USD			30.00 USD
06/21/2019	Fee	Review Vern Rose (form NIOSH warnings expert) to prepare for call with OSHA expert (Stanley) (1.7); attend phone interview with Dr. Stanley and report same (1.0)	L340		11377	2.70	530.00 USD	0.00 USD			1,431.00 USD
06/21/2019	Fee	Continuing research of Arizona law governing standards for expert witnesses, expanding to Arizona federal courts and into asbestos cases per comments from strategy meeting.	L120		143538	2.10	375.00 USD	0.00 USD			787.50 USD
06/19/2019	Fee	Attending depositions of Matt Hodges and Melinda Farias of Valero.	L330		143538	2.40	375.00 USD	0.00 USD			900.00 USD
06/17/2019	Fee	Review and process errata sheets and acknowledgment pages of Dennis Gilmore and Douglas Kleopfer.	L140		141349	0.60	150.00 USD	0.00 USD			90.00 USD

Date	Type	Desc	Task/ Expense	Act	TK ID	Hours/ Units	Rate	Disc	Adj	Tax	Net Amount
06/19/2019	Fee	Request background checks on two possible witnesses.	L110		141349	0.20	150.00 USD	0.00 USD			30.00 USD
06/21/2019	Fee	Gather prior COP production, generate and process link to Plaintiff counsel.	L140		141349	0.60	150.00 USD	0.00 USD			90.00 USD
06/20/2019	Fee	Interview Bob Lowe, memorialize same, and discuss path forward with client	L330		11377	0.80	530.00 USD	0.00 USD			424.00 USD
06/20/2019	Fee	Review research on potential fact witness (.1); conference call with M Neally re certain safety issues (.2)	L330		11377	0.30	530.00 USD	0.00 USD			159.00 USD
06/14/2019	Fee	Complete written analysis and risk update after witness depositions for M Oglesby and respond to follow-up questions re same (1.4); attend insurance call with Canal s outside counsel to answer questions re path forward (.5)	L160		11377	1.90	530.00 USD	0.00 USD			1,007.00 USD
06/04/2019	Fee	All counsel joint-defense call re experts and expert needs	L120		11377	1.20	530.00 USD	0.00 USD			636.00 USD
06/04/2019	Fee	Prepare materials and index for expert on IH and terminal safety (2.0); strategic discussions on path forward concerning resolution with Matt Oglesby (.7)	L340		11377	2.70	530.00 USD	0.00 USD			1,431.00 USD
06/07/2019	Fee	Settlement discussions with Keith Patton and discussion with client re 30b6 issues, future discovery, trial strategy, and cost of same	L120		11377	1.50	530.00 USD	0.00 USD			795.00 USD
06/18/2019	Fee	Joint defense call re pathology review, discovery approach, and expert needs	L120		11377	0.30	530.00 USD	0.00 USD			159.00 USD
06/07/2019	Fee	Gabe Munoz interview and follow-up with client re truck driver track down and contact information	L330		11377	0.70	530.00 USD	0.00 USD			371.00 USD
06/18/2019	Fee	Synthesis of social media information, witness interviews, and COP personnel records to provide track down information for three leads of former truck drivers	L110		11377	0.40	530.00 USD	0.00 USD			212.00 USD
06/05/2019	Fee	Expert call with Mark Neally re IH report and approach to general opinions (rebutting Dr. Jones) and defendant-specific opinions	L340		11377	1.60	530.00 USD	0.00 USD			848.00 USD
06/17/2019	Fee	Expert report prep call with Mark Neally (John Spencer) concerning P66-specific issues	L340		11377	1.50	530.00 USD	0.00 USD			795.00 USD

Date	Type	Desc	Task/ Expense	Act	TK ID	Hours/ Units	Rate	Disc	Adj	Tax	Net Amount
06/19/2019	Fee	Joint defense call re Valero admission of carcinogenicity of gasoline (.1); call with hematology expert Ethan Natelson re report and approach (.6); review draft report from John Whysner and interview same for approach to expert report (1.6)	L340		11377	2.30	530.00 USD	0.00 USD			1,219.00 USD
06/12/2019	Fee	Continuing research of Arizona law governing relevant expert issues.	L340		143538	7.80	375.00 USD	0.00 USD			2,925.00 USD
06/11/2019	Fee	Attending meeting regarding action items and path forward; Attending depositions of Robert Granado and Terese Tuazon; researching Arizona law governing relevant expert issues.	L330		143538	7.50	375.00 USD	0.00 USD			2,812.50 USD
06/13/2019	Fee	Continuing research of Arizona law governing relevant expert issues, attending conference call with defense counsel regarding records authorizations	L340		143538	8.20	375.00 USD	0.00 USD			3,075.00 USD
06/10/2019	Fee	Gather documents and deposition transcripts and prepare letter to expert Mark Nealley and process same to him.	L140		141349	3.10	150.00 USD	0.00 USD			465.00 USD
06/13/2019	Fee	Telephone conference with court reporter to obtain all recent deposition transcripts.	L110		141349	0.20	150.00 USD	0.00 USD			30.00 USD
06/10/2019	Fee	Review and process letters from court reporter regarding Dennis Gilmore and Douglas Kleopfer s errata sheet and signature pages and calendar same.	L140		141349	0.30	150.00 USD	0.00 USD			45.00 USD
06/11/2019	Fee	Telephone conference and correspondence with court reporter regarding copies of deposition transcripts.	L110		141349	0.20	150.00 USD	0.00 USD			30.00 USD
06/04/2019	Fee	Attending Canal insurance call	L120		143538	0.90	375.00 USD	0.00 USD			337.50 USD
06/06/2019	Fee	Reviewing 7000+ pages of production to identify documents to send to experts and composing report regarding same	L340		143538	4.10	375.00 USD	0.00 USD			1,537.50 USD
06/05/2019	Fee	Review and process deposition transcript of Jeff Acup.	L140		141349	0.10	150.00 USD	0.00 USD			15.00 USD
06/05/2019	Fee	Telephone conference with co-counsel s paralegal regarding outstanding pleadings and discovery.	L110		141349	0.40	150.00 USD	0.00 USD			60.00 USD
06/27/2019	Expense	1 COPIES 84 HOMFD4644C	E101		141349	84.00	0.10 USD	0.00 USD			8.40 USD
06/11/2019	Expense	1 COPIES 5 HO4647	E101		143538	5.00	0.10 USD	0.00 USD			0.50 USD

Date	Type	Desc	Task/ Expense	Act	TK ID	Hours/ Units	Rate	Disc	Adj	Tax	Net Amount
06/10/2019	Expense	1 COPIES 7 HO4645	E101		141349	7.00	0.10 USD	0.00 USD			0.70 USD
06/19/2019	Expense	PR00302471 Deposition transcript of Dennis Gilmore-Client- Depositions/Transcripts - VERITEXT -	E116		11377	1.00	549.25 USD	0.00 USD			549.25 USD
06/18/2019	Expense	PR00302467 Deposition transcript of Douglas Kleopfer- Client-Depositions/ Transcripts - VERITEXT -	E116		11377	1.00	458.80 USD	0.00 USD			458.80 USD
06/07/2019	Expense	ER00182025 05/31/2019 - Brett Young - to - Transportation fees for witness Dennis Gilmore	E110		11377	1.00	85.00 USD	0.00 USD			85.00 USD
06/07/2019	Expense	ER00182025 05/30/2019 - Brett Young - to - Transportation fees for witness Dennis Gilmore	E110		11377	1.00	85.00 USD	0.00 USD			85.00 USD
06/06/2019	Expense	PR00301113 Doub Kleopfer Deposition - Lunch-Client-Meals - CORPORATE CATERING CONCIERGE -	E111			1.00	191.42 USD	0.00 USD			191.42 USD